

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<b>I. (a) PLAINTIFFS</b> Gilbert Backers	<b>DEFENDANTS</b> Chex Systems, Inc. and X, Y, Z Corporations
<b>(b)</b> County of Residence of First Listed Plaintiff <u>Montgomery County, PA</u> <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i>	County of Residence of First Listed Defendant <u>Woodbury, MN</u> <i>(IN U.S. PLAINTIFF CASES ONLY)</i>
<b>(c)</b> Attorneys (Firm Name, Address, and Telephone Number) Vicki Piontek, Esq. 951 Allentown, Rd. Lansdale, PA 19446	NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.  Attorneys (If Known) Thomas F. Lucchesi, Esq. Marshall Dennehey Warner Coleman & Goggin, P.C. 2000 Market Street, Suite 2300 Philadelphia, PA 19103 215-575-4564

<b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)	<b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)																								
<input type="checkbox"/> 1 U.S. Government Plaintiff <input type="checkbox"/> 2 U.S. Government Defendant <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th></th> <th>PTF</th> <th>DEF</th> <th></th> <th>PTF</th> <th>DEF</th> </tr> <tr> <td>Citizen of This State</td> <td><input type="checkbox"/> 1</td> <td><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td><input type="checkbox"/> 4</td> <td><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/> 2</td> <td><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/> 5</td> <td><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input type="checkbox"/> 3</td> <td><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td><input type="checkbox"/> 6</td> <td><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				


<b>IV. NATURE OF SUIT</b> (Place an "X" in One Box Only)	<b>CONTRACT</b> <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>TORTS</b> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top; padding: 5px;"> <b>PERSONAL INJURY</b>  <input type="checkbox"/> 310 Airplane  <input type="checkbox"/> 315 Airplane Product Liability  <input type="checkbox"/> 320 Assault, Libel &amp; Slander  <input type="checkbox"/> 330 Federal Employers' Liability  <input type="checkbox"/> 340 Marine  <input type="checkbox"/> 345 Marine Product Liability  <input type="checkbox"/> 350 Motor Vehicle  <input type="checkbox"/> 355 Motor Vehicle Product Liability  <input type="checkbox"/> 360 Other Personal Injury  <input type="checkbox"/> 362 Personal Injury - Medical Malpractice           </td> <td style="width: 50%; vertical-align: top; padding: 5px;"> <b>PERSONAL INJURY</b>  <input type="checkbox"/> 365 Personal Injury - Product Liability  <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability  <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability  <b>PERSONAL PROPERTY</b>  <input type="checkbox"/> 370 Other Fraud  <input type="checkbox"/> 371 Truth in Lending  <input type="checkbox"/> 380 Other Personal Property Damage  <input type="checkbox"/> 385 Property Damage Product Liability           </td> </tr> </table>	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<b>FORFEITURE/PENALTY</b> <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other  <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act  <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<b>BANKRUPTCY</b> <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157  <b>PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark  <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g))  <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<b>OTHER STATUTES</b> <input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability						

<b>V. ORIGIN</b> (Place an "X" in One Box Only)
<input type="checkbox"/> 1 Original Proceeding <input checked="" type="checkbox"/> 2 Removed from State Court <input type="checkbox"/> 3 Remanded from Appellate Court <input type="checkbox"/> 4 Reinstated or Reopened <input type="checkbox"/> 5 Transferred from Another District (specify) <input type="checkbox"/> 6 Multidistrict Litigation

<b>VI. CAUSE OF ACTION</b>	Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 15 U.S.C. 1692, et seq. Brief description of cause: Fair Debt Collection Practices Act
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<b>VII. REQUESTED IN COMPLAINT:</b>	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.            DEMAND \$ _____            CHECK YES only if demanded in complaint: JURY DEMAND: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
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<b>VIII. RELATED CASE(S) IF ANY</b> (See instructions):	JUDGE _____ DOCKET NUMBER _____
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DATE 10/22/2015 SIGNATURE OF ATTORNEY OF RECORD 

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_

**INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44****Authority For Civil Cover Sheet**

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

- I. (a) Plaintiffs-Defendants.** Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official, giving both name and title.
  - (b) County of Residence.** For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)
  - (c) Attorneys.** Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".
- II. Jurisdiction.** The basis of jurisdiction is set forth under Rule 8(a), F.R.Cv.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
- United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
- United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
- Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked.
- Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; **NOTE: federal question actions take precedence over diversity cases.**)
- III. Residence (citizenship) of Principal Parties.** This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.
- IV. Nature of Suit.** Place an "X" in the appropriate box. If the nature of suit cannot be determined, be sure the cause of action, in Section VI below, is sufficient to enable the deputy clerk or the statistical clerk(s) in the Administrative Office to determine the nature of suit. If the cause fits more than one nature of suit, select the most definitive.
- V. Origin.** Place an "X" in one of the six boxes.
- Original Proceedings. (1) Cases which originate in the United States district courts.
- Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.
- Remanded from Appellate Court. (3) Check this box for cases remanded to the district court for further action. Use the date of remand as the filing date.
- Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.
- Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.
- Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.
- VI. Cause of Action.** Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553 Brief Description: Unauthorized reception of cable service
- VII. Requested in Complaint.** Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.
- Demand. In this space enter the actual dollar amount being demanded or indicate other demand, such as a preliminary injunction.
- Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.
- VIII. Related Cases.** This section of the JS 44 is used to reference related pending cases, if any. If there are related pending cases, insert the docket numbers and the corresponding judge names for such cases.

**Date and Attorney Signature.** Date and sign the civil cover sheet.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

**GLBERT BACKERS**

: **CIVIL ACTION**

**v.**

:

:

**CHEX SYSTEMS, INC., ET AL**

: **NO.**

In accordance with the Civil Justice Expense and Delay Reduction Plan of this court, counsel for plaintiff shall complete a Case Management Track Designation Form in all civil cases at the time of filing the complaint and serve a copy on all defendants. (See § 1:03 of the plan set forth on the reverse side of this form.) In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

**SELECT ONE OF THE FOLLOWING CASE MANAGEMENT TRACKS:**

- (a) Habeas Corpus-Cases brought under 28 U.S.C. §2241 through §2255. ( )
- (b) Social Security-Cases requesting review of a decision of the Secretary of Health and Human Services denying plaintiff Social Security Benefits. ( )
- 
- (c) Arbitration-Cases require to be designated for arbitration under Local Civil Rule 53.2. ( )
- (d) Asbestos-Cases involving claims for personal injury or property damage from exposure to asbestos. ( )
- (e) Special Management-Cases that do not fall into tracks (a) through (d) that are commonly referred to as complex and that need special or intense management by the court. (See reverse side of this form for a detailed explanation of special management cases.) ( )
- (f) Standard Management--Cases that do not fall into any one of the other tracks. (X)

October 22, 2015

Date

  
Thomas F. Lucchesi, Esq.

Attorney-at-law

Defendant,  
Chex Systems, Inc.

Attorney for

(215) 575-4564

Telephone

(215) 575-0856

FAX Number

tflucchesi@mdwecg.com

E-Mail Address

(Civ. 660) 10/02

551629

**Civil Justice Expense and Delay Reduction Plan  
Section 1:03 - Assignment to a Management Track**

(a) The clerk of court will assign cases to tracks (a) through (d) based on the initial pleading.

(b) In all cases not appropriate for assignment by the clerk of court to tracks (a) through (d), the plaintiff shall submit to the clerk of court and serve with the complaint on all defendants a case management track designation form specifying that the plaintiff believes the case requires Standard Management of Special Management. In the event that a defendant does not agree with the plaintiff regarding said designation, that defendant shall, with its first appearance, submit to the clerk of court and serve on the plaintiff and all other parties, a case management track designation form specifying the track to which that defendant believes the case should be assigned.

(c) The court may, on its own initiative or upon the request of any party, change the track assignment of any case at any time.

(d) Nothing in this Plan is intended to abrogate or limit a judicial officer's authority in any case pending before that judicial officer, to direct pretrial and trial proceedings that are more stringent than those of the Plan and that are designed to accomplish cost and delay reduction.

(e) Nothing in this Plan is intended to supersede Local Civil Rules 3 or 7, or the procedure for random assignment of Habeas Corpus and Social Security cases referred to magistrate judges of the court.

**SPECIAL MANAGEMENT CASE ASSIGNMENTS  
(See § 1.02(e) Management Track Definitions of the  
Civil Justice Expense and Delay Reduction Plan)**

Special management cases will usually include that class of cases commonly referred to as "complex litigation" as that term has been used in the Manuals for

Complex Litigation. The first manual was prepared in 1969 and the Manual for Complex Litigation Second, MCL 2d was prepared in 1985. This term is intended to include cases that present unusual problems and require extraordinary treatment. See §0.1 of the first manual. Cases may require special or intense management by the court due to one or more of the following factors: (1) large number of parties; (2) large number of claims or defenses; (3) complex factual issues; (4) large volume of evidence; (5) problems locating or preserving evidence; (6) extensive discovery; (7) exceptionally long time needed to prepare for disposition; (8) decision needed within an exceptionally short time; and (9) need to decide preliminary issues before final disposition. It may include two or more related cases. Complex litigation typically includes such as antitrust cases; cases involving a large number of parties or an unincorporated association of large membership; cases involving requests for injunctive relief affecting the operation of large business entities; patent cases; copyright and trademark cases; common disaster cases

such as those arising from aircraft crashes or marine disasters; actions brought by individual stockholders; stockholder's derivative and stockholder's representative actions; class actions of potential class actions; and other civil (and criminal) cases involving unusual multiplicity or complexity of factual issues. See §0.22 of the first Manual for Complex Litigation and Manual for Complex Litigation Second, Chapter 33.

551629

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**CASE MANAGEMENT TRACK DESIGNATION FORM**

**GLBERT BACKERS**

**: CIVIL ACTION**

**v.**

**:**

**:**

**CHEX SYSTEMS, INC., ET AL**

**: NO.**

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October 22, 2015

Date

  
Thomas F. Lucchesi, Esq.

Attorney-at-law

Defendant,  
Chex Systems, Inc.

Attorney for

(215) 575-4564

Telephone

(215) 575-0856

FAX Number

tflucchesi@mdwecg.com

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(Civ. 660) 10/02



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551629



**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff Gilbert Backers c/o Vicki Piontek, Esquire – 951 Allentown Rd., Lansdale, PA 19446

Address of Defendant Chex Systems, Inc. c/o Thomas F. Lucchesi, Esquire – 2000 Market Street, Ste. 2300, Philadelphia, PA 19103

Place of Accident, Incident or Transaction Montgomery County, Pennsylvania

*(Use Reverse Side for Additional Space)*

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more if its stock?  
(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 8.1(a)) Yes ☒ No ☐

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

**RELATED CASE, IF ANY:**

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_

Date Terminated \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier number case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

**A. Federal Question Cases:**

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases  
(Please specify) Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq.

**B. Diversity Jurisdiction Cases**

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability – Asbestos
9. ☐ All other Diversity Cases  
(Please specify)

**ARBITRATION CERTIFICATION**

*(Check appropriate Category)*

I, \_\_\_\_\_ counsel of record do hereby certify:

- ☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs;
- ☐ Relief other than monetary damages is sought.

DATE October 22, 2015

Thomas F. Lucchesi, Esquire

Attorney-at-Law

313126

Attorney I.D. #

**NOTE: A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.**

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE \_\_\_\_\_

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DESIGNATION FORM to be used by counsel to indicate the category of the case for the purpose of assignment to appropriate calendar.

Address of Plaintiff Gilbert Backers c/o Vicki Piontek, Esquire – 951 Allentown Rd., Lansdale, PA 19446

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Place of Accident, Incident or Transaction Montgomery County, Pennsylvania

*(Use Reverse Side for Additional Space)*

Does this civil action involve a nongovernmental corporate party with any parent corporation and any publicly held corporation owning 10% or more of its stock?

(Attach two copies of the Disclosure Statement Form in accordance with Fed.R.Civ.P. 8.1(a))

Yes ☒ No ☐

Does this case involve multidistrict litigation possibilities?

Yes ☐ No ☒

**RELATED CASE, IF ANY:**

Case Number: \_\_\_\_\_ Judge \_\_\_\_\_ Date Terminated \_\_\_\_\_

Civil cases are deemed related when yes is answered to any of the following questions:

1. Is this case related to property included in an earlier numbered suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
2. Does this case involve the same issue of fact or grow out of the same transaction as a prior suit pending or within one year previously terminated action in this court?  
Yes ☐ No ☒
3. Does this case involve the validity or infringement of a patent already in suit or any earlier number case pending or within one year previously terminated action in this court?  
Yes ☐ No ☒

CIVIL: (Place ☒ in ONE CATEGORY ONLY)

**A. Federal Question Cases:**

1. ☐ Indemnity Contract, Marine Contract, and All Other Contracts
2. ☐ FELA
3. ☐ Jones Act-Personal Injury
4. ☐ Antitrust
5. ☐ Patent
6. ☐ Labor-Management Relations
7. ☐ Civil Rights
8. ☐ Habeas Corpus
9. ☐ Securities Act(s) Cases
10. ☐ Social Security Review Cases
11. ☒ All other Federal Question Cases

(Please specify) Fair Debt Collection Practices Act, 15 U.S.C. § 1692, et seq.

**B. Diversity Jurisdiction Cases**

1. ☐ Insurance Contract and Other Contracts
2. ☐ Airplane Personal Injury
3. ☐ Assault, Defamation
4. ☐ Marine Personal Injury
5. ☐ Motor Vehicle Personal Injury
6. ☐ Other Personal Injury (Please specify)
7. ☐ Products Liability
8. ☐ Products Liability – Asbestos
9. ☐ All other Diversity Cases

(Please specify)

**ARBITRATION CERTIFICATION**

*(Check appropriate Category)*

I, \_\_\_\_\_ counsel of record do hereby certify:

☐ Pursuant to Local Civil Rule 53.2, Section 3(c)(2), that to the best of my knowledge and belief, the damages recoverable in this civil action case exceed the sum of \$150,000.00 exclusive of interest and costs:

☐ Relief other than monetary damages is sought.

DATE October 22, 2015

Thomas F. Lucchesi, Esquire

Attorney-at-Law

313126

Attorney I.D. #

**NOTE:** A trial de novo will be a trial by jury only if there has been compliance with F.R.C.P. 38.

I certify that, to my knowledge, the within case is not related to any case now pending or within one year previously terminated action in this court except as noted above.

DATE \_\_\_\_\_

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**GLBERT BACKERS,**

Plaintiff,

**vs.**

**CHEX SYSTEMS, INC. AND X, Y, Z  
CORPORATION**

Defendant.

**Civil Action No.**

**NOTICE OF REMOVAL**

**PLEASE TAKE NOTICE THAT**, pursuant to 28 U.S.C. § 1441(b) and 28 U.S.C. § 1331, Defendant, Chex Systems, Inc. (hereafter "CHEX") by and through its counsel, Marshall Dennehey Warner Coleman & Goggin, P.C., hereby removes the action captioned as Glberty Backers v. Chex Systems, Inc. and X, Y, Z Corporation, as filed in the Court of Common Pleas for Montgomery County, Pennsylvania ("the Action"), to the United States District Court for the Eastern District of Pennsylvania, based upon the following:

1. On or about September 11, 2015 Plaintiff filed the Action in the Court of Common Pleas for Philadelphia County, Pennsylvania. A true and correct copy of Plaintiff's Complaint in the Action is attached hereto as Exhibit "A."

2. Chex first received notice of the Action on September 22, 2015, when it was served with Plaintiff's Complaint.

3. Based on the foregoing, Chex has timely filed this Notice of Removal within thirty days of being served with the Complaint and within

thirty days of the date that the Action was first removable. See 28 U.S.C. § 1446(b).

4. The Action is a civil action of which this Court has original jurisdiction under 28 U.S.C. § 1331, and is one which may be removed to this Court by Chex pursuant to the provisions of 28 U.S.C. § 1441(b), in that Plaintiff has alleged that Chex violated the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 *et seq.*, ("FDCPA") thereby asserting claims that arise under federal law.

5. In that the causes of action alleged by the Plaintiff arise from the performance of obligations of the parties within Montgomery County, Pennsylvania, the United States District Court for the Eastern District of Pennsylvania should be assigned the Action.

6. Pursuant to 28 U.S.C. § 1446(d), Chex will file a copy of this Notice of Removal with the Clerk of the United States District Court for the Eastern District of Pennsylvania, will serve Plaintiff with a copy of this Notice of Removal and will file the Notice of Removal in the Montgomery County Court of Common Pleas.

**WHEREFORE**, Defendant, Chex Systems, Inc. notifies this Court that this cause is removed from the Court of Common Pleas for Montgomery County, Pennsylvania to the United States District Court for the Eastern District of Pennsylvania pursuant to the provisions of 28 U.S.C. §§1331, and 1446.

Respectfully submitted,

**MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN, P.C.**

By: 

---

THOMAS F. LUCCHESI  
2000 Market Street, Suite 2300  
Philadelphia, PA 19103  
(215) 575-4564 / (215) 575-0856 (f)  
tflucchesi@mdwcg.com  
Attorneys for Defendant  
Chex Systems, Inc.

Dated: October 22, 2015

**THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**GLBERT BACKERS,**

Plaintiff,

**vs.**

**CHEX SYSTEMS, INC. AND X, Y, Z  
CORPORATION**

Defendant.

Civil Action No.

**CERTIFICATE OF SERVICE**

I, Thomas F. Lucchesi, Esq., do hereby certify that a true and correct copy of Defendant Chex Systems, Inc.'s **Notice of Removal** was served upon the below-listed counsel for Plaintiff via U.S. mail on October 22, 2015:

Vicki Piontek, Esq.  
951 Allentown Rd.  
Lansdale, PA 19446

**MARSHALL DENNEHEY WARNER  
COLEMAN & GOGGIN, P.C.**

By: 

THOMAS F. LUCCHESI  
Attorneys for Defendant  
Chex Systems, Inc.



# **EXHIBIT "A"**

---

IN THE COURT OF COMMON PLEAS OF MONTGOMERY COUNTY, PENNSYLVANIA

GILBERT BACKERS

vs.

CHEX SYSTEMS INC

RECEIVED SEP 22 2015

NO. 2015-24612

NOTICE TO DEFEND - CIVIL

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYER REFERENCE SERVICE  
MONTGOMERY BAR ASSOCIATION  
100 West Airy Street (REAR)  
NORRISTOWN, PA 19404-0268

(610) 279-9660, EXTENSION 201

PRIF0034  
R 10/11

Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00

Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00

In the Court of Common Pleas  
Of Montgomery County, Pennsylvania  
Civil action - Law

Gilbert Backers	:	
80 East Collom St., Apartment 206	:	
Philadelphia, Pa 19144	:	
Plaintiff	:	
v.	:	2015-24612
Chex Systems, Inc.	:	
7805 Hudson Road, Suite 100	:	
Woodbury, MN, 55125	:	Jury Trial Demanded
and	:	
X,Y,Z Corporations	:	
Defendant(s)	:	

**NOTICE TO DEFEND**

You have been sued in Court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this Complaint and Notice are served by entering a written appearance personally or by attorney and filing in writing with the Court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the Court without further notice to you for any money claimed in the Complaint or for any other claim or relief requested by Plaintiff(s). You may lose money or property or other rights important to you.

See Next Page ----->>>>>>

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU  
DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR  
TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU  
CAN GET LEGAL HELP:

LAWYER REFERENCE SERVICE  
MONTGOMERY COUNTY BAR ASSOCIATION  
100 West Airy Street (REAR), NORRISTOWN, PA 19401  
(610) 279-9660, EXTENSION 201

Montgomery County Legal Aid Services  
625 Swede Street, Norristown, PA 19401  
610-275-5400

Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00

In the Court of Common Pleas  
Of Montgomery County, Pennsylvania  
Civil action - Law

Gilbert Backers  
80 East Collom St., Apartment 206  
Philadelphia, Pa 19144

Plaintiff

v.  
Chex Systems, Inc.  
7805 Hudson Road, Suite 100  
Woodbury, MN, 55125  
and  
X,Y,Z Corporations

Defendant(s)

2015-24612

Jury Trial Demanded

**COMPLAINT**

1. This is an action brought by a consumer for violation of alleged violations of the Fair Credit Reporting Act (FCRA), 15 USC 1681 et. Seq.
2. Plaintiff is Gilbert Backers, an adult individual, with a mailing address including but not limited to 80 East Collom Street, Apartment 206, Philadelphia, PA 19144.
3. Defendants is Chex Systems, Inc., a business entity with a place of business located at 7805 Hudson Road, Suite 100, Woodbury, MN, 55125.

Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00

**JURISDICTION AND VENUE**

4. The previous paragraphs of this complaint are incorporated by reference and made a part hereof.
5. Jurisdiction and venue are proper because a substantial portion of the transactions, occurrences or omissions took place in this jurisdiction.
6. Jurisdiction and venue are proper because Defendant regularly transacts business in this jurisdiction and avails itself of the market place in this jurisdiction.
7. Jurisdiction and venue are proper in this jurisdiction because one or more key witnesses may be located in this jurisdiction.
8. Jurisdiction and venue are proper in this jurisdiction because one or more similarly situated consumer plaintiffs may be located in this jurisdiction.
9. Jurisdiction and venue are proper in this jurisdiction because the Plaintiff resides near this jurisdiction.



**COUNT ONE: Violation of the Fair Credit Reporting Act  
and the Fair and Accurate Credit Transaction Act,  
15 USC 1681 et. seq.**

10. All previous paragraphs of this complaint are incorporated by reference and made a part of this complaint.
11. At all times mentioned herein Plaintiff was a consumer as defined by 15 USC 1681a et. seq.
12. At all times mentioned herein Plaintiff was a person as defined by 15 USC 1681a (c).
13. At all times mentioned herein Plaintiff was an individual as defined by 15 USC 1681a (c).
14. At all times mentioned in this Complaint, Defendant(s) maintained a "consumer report" on Plaintiff as defined by 15 USC 1681a(d) et. seq.
15. At all times mentioned in this Complaint, Defendant(s) was a "consumer Reporting Agency" (CRA) as defined by 15 USC 1681a(f) et. seq.
16. At all times mentioned in this Complaint, Defendant(s) was a "person" as defined by 15 USC 1681a(f) et. seq.
17. Prior to the commencement of this action, Plaintiff contacted Defendant(s) in writing and requested a copy of the information contained in Plaintiff's Chex Systems, Inc. consumer report.
18. Defendant(s) did provide Plaintiff with a free annual copy of Plaintiff's consumer report.

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19. The consumer report provided to Plaintiff by Defendant(s) contained the names and addresses of certain business entities that had accessed Plaintiff's consumer report in the last 12 months.
20. Not all of the telephone numbers for the entities that had accessed Plaintiff's consumer report were disclosed to Plaintiff on Plaintiff's consumer report.
21. According to 15 USC 1681g(a), a CRA is required to disclose to the consumer the names of all persons or business entities that accessed the consumer's report within the last 12 months of the date of the report.
22. In addition to the requirement to disclose the names of all persons or business entities that accessed the consumer's report, the consumer reporting agency is also required to provide the telephone number for the persons or business entities that accessed the consumer's report in the last 12 months, upon written request of the consumer to disclose such telephone number(s), pursuant to 15 USC 1681g(a)(3).
23. The following two business entities accessed Plaintiff's Chex Systems, Inc. consumer report from Defendant(s).
  - a. American Heritage Federal Credit Union Date of Inquiry 11/29/2014.
  - b. Beneficial Bank Date of Inquiry 6/13/2014

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24. Plaintiff requested the address and telephone numbers for the above referenced entities which had accessed Plaintiff's consumer report in the last 12 months prior to the date of such request(s). See attached exhibits.
25. Plaintiff's request(s) for the address and telephone numbers for such entities were in writing. See attached exhibits.
26. Plaintiff's requests for the address and telephone number for such entities are detailed in the attached exhibits.
27. Defendant(s) received Plaintiff's written request(s) for the address and telephone numbers of the above referenced entities which had accessed Plaintiff's Chex Systems consumer report within 12 months prior to such request(s). See attached exhibits.
28. Defendant(s) refused to disclose to Plaintiff's the address and telephone numbers for the above referenced entities that had accessed Plaintiff's Chex Systems reports 12 months prior to such request(s). See attached exhibits.
29. By refusing to disclose to Plaintiff's the address and telephone numbers for the above referenced entities that had accessed Plaintiff's Chex Systems reports 12 months prior to such request(s), Defendant(s) violated 15 USC 1681g(a)(3).

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30. It is believed and averred that Defendant(s)' failure to provide such address and telephone numbers information was willful for reasons including but not limited to the following.
  - a. The number of requests for the address and telephone numbers that Plaintiff made to Defendant.
  - b. The number of times Defendant(s) ignored Plaintiff's requests for the address and telephone number of the above referenced entities.
  - c. The number of similarly situated consumers whose rights were also violated under 15 USC 1581g in a similar manner to Plaintiff.
  - d. It is believed and averred that Defendant(s)' acts and omissions were caused by standard business practices antithetical to Defendant(s)' duties under 15 USC 1681g et. seq.
31. Defendant(s) is liable for the acts committed by its agents under the doctrine of respondeat superior because Defendant's agents were acting within the scope of their employment with Defendant.
32. In the alternative, Defendant(s) is liable for the conduct of its agents / employees under the theory of joint and several liability because Defendant and its agents / employees were engaged in a joint venture and were acting jointly and in concert.
33. Any mistake made by Defendant(s) would have included a mistake of law.
34. Any mistake made by Defendant(s) would not have been a reasonable or bona fide mistake.

**LIABILITY AND DAMAGES**

35. The previous paragraphs of this complaint are incorporated by reference.
36. At all times various employees and / or agents of Defendant(s) were acting as agents of Defendant(s), and therefore Defendant(s) is liable to for the acts committed by its agents and / or employees under the doctrine of respondeat superior.
37. At all times various employees and / or agents of Defendant(s) were acting jointly and in concert with Defendant(s), and Defendant(s) is liable for the acts of such employees and / or agents under the theory of joint and several liability because Defendant(s) and its agents were engaged in a common business venture and were acting jointly and in concert.
38. Plaintiff's actual damages are \$1.00 more or less, including but not limited to postage, stationary, fax, gas, mileage, etc.

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39. Plaintiff believes and avers that the violation(s) of the FCRA described in this Complaint was / were willful, as exemplified by the following.
  - a. Defendant(s)' aforementioned acts and omissions were caused by Defendant(s)' standard business practices and policies antithetical to Defendant(s) duties under 15 USC 1681e and 15 USC 1681g et. seq. to disclose information about the address and telephone numbers for the entities that accessed a consumer's report.
40. Because of the willful nature of the violations described in this Complaint, Plaintiff believes and avers Plaintiff is entitled \$1,000.00 statutory damages under 15 USC 1681 et. seq. per violation, or other amount in this Honorable Court's discretion.
41. Because Defendant(s) act and omissions were willful, Plaintiff believes and avers that punitive damages are warranted.
42. Plaintiff believes and avers that punitive damages should be awarded to Plaintiff in the amount of no less than \$9,000, or other amount determined by this Honorable Court.



**ATTORNEY FEES**

43. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.

44. Plaintiff believes and avers that Plaintiff is entitled to attorney fees of \$1,400.00 at a rate of \$350.00 per hour, described below.

a. Consultation with Client and drafting	1
b. Drafting, editing, review, filing and service of complaint and related documents	1
c. Follow up correspondence with Defense	2

---

Total = 4	\$1,400
-----------	---------

45. The above referenced attorney fees are a reasonable estimate of the hours spent to date as well as necessary follow up.

46. Plaintiff's attorney fees continue to accrue as the case moves forward.

**OTHER RELIEF**

47. The previous paragraphs of this Complaint are incorporated by reference and made a part of this Complaint.
48. Plaintiff seeks an order from this Honorable Court Directing Defendant(s) to cease reporting the disputed account.
49. Plaintiff requests / demands a jury trial in this matter.
50. Plaintiff believes and avers that Plaintiff should be entitled to the filing fee for prosecuting this action.
51. Plaintiff believes and avers that Plaintiff should be entitled to administrative costs for prosecuting this action.
52. Plaintiff requests such other relief as this Honorable Court may deem just and proper.

Wherefore, Plaintiff demands judgment against Defendant(s) in the amount of  
\$11,401.00 enumerated below.

\$1.00 actual damages

\$1,000.00 statutory damages for Count One

\$1,400.00 attorney fees

\$9,000.00 punitive damages

---

\$11,401

Plaintiff also seeks the filing fee and administrative costs. Plaintiff also seeks  
such other relief as this Honorable Court deems fair and just.

/s/ Vicki Piontek

9/11/15

Vicki Piontek, Esquire  
Attorney for Plaintiff  
951 Allentown Road  
Lansdale, PA 19446  
877-737-8617  
Fax: 866-408-6735  
palaw@justice.com

Date

In the Court of Common Pleas  
Of Montgomery County, Pennsylvania  
Civil action - Law

Gilbert Backers  
80 East Collom St.  
Philadelphia, AP 19150

Plaintiff

v.  
Chex Systems, Inc.  
7805 Hudson Road, Suite 100  
Woodbury, MN, 55125  
and  
X,Y,Z Corporations

Defendant(s)

Defendant(s)

Jury Trial Demanded

VERIFICATION

I, Gilbert Backers, verify that the statements contained in the complaint are true and correct to the best of my knowledge, understanding and belief.

  
Gilbert Backers  
Date 

Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00

# EXHIBITS

Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00

Gilbert J. Backers  
80 East Collom Street  
Apartment 206  
Philadelphia, Pa 19144  
215 [REDACTED]

Chex Systems, Inc.  
7805 Hudson Road, Suite 100  
Woodbury, MN 55125

RE: Gilbert J. Backers SSN: [REDACTED] DOB: [REDACTED]

To Whom it May Concern:

I would like to request a free copy of my consumer report. I would like all information contained in my file.

Please provide the name, address and telephone number of all persons or entities that have accessed my consumer report in the last 12 months.

Enclosed please find a copy of my identification.

Please redact the first five digits of my Social Security number on my consumer report. Please do not print the first five digits of my Social Security number on my consumer report.

Thank you.

Sincerely,

Gilbert J. Backers 1/22/15  
Gilbert J. Backers Date

Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00



Case Number: [REDACTED]

Thursday, January 08, 2015

**SSN Records**

This section contains information associated with the Social Security Numbers on your file.

SSN	XXX-XX-XXXX	Low / High Issue Date	01/1965 / 12/1987
State of Issuance	PA	SSN Issuance Source	Social Security Administration
Reported Deceased	No	Death Record Source	

State of Issuance provides postal abbreviations of U.S. states and territories, including less common examples: GS (Guam, Samoa, or the Philippines), PR (Puerto Rico), RN (Asian Refugee), RR (Railroad Program) and EE (Enumeration at Entry).

**Short-Term Credit Offer Request Records**

No Records Found

**Watercraft Records**

No Records Found

**Inquiry Records****Inquiry records that do not impact your credit rating**

These inquiries are not reported to any third party or used in credit scoring. The purpose of each inquiry is noted below and may include promotional offers, account reviews, employment or volunteer screening, your own requests to check your credit, or other permissible purposes. RiskView will report these inquiries on your file for up to 12 months. Employment screening inquiries will be reported on your file for up to 24 months.

Company Making the Inquiry	Bartender Consumer USA INC DBA Drive Financial Services, 8585 North Stemmons Freeway, Suite 1100 North, Dallas, TX 75247	Inquiry Date	11-02-2014
Inquiry Name	GILBERT BACKERS	Inquiry Date of Birth	04-28-50
Inquiry Address	2216 W TIOGA ST PHILADELPHIA, PA 19140	Inquiry SSN	XXX-XX-XXXX
		Inquiry Purpose	Portfolio Review
		Inquiry Phone	
Company Making the Inquiry	Bartender Consumer USA INC DBA Drive Financial Services, 8585 North Stemmons Freeway, Suite 1100 North, Dallas, TX 75247	Inquiry Date	08-03-2014
Inquiry Name	GILBERT BACKERS	Inquiry Date of Birth	04-28-50
Inquiry Address	2216 W TIOGA ST PHILADELPHIA, PA 19140	Inquiry SSN	XXX-XX-XXXX
		Inquiry Purpose	Portfolio Review
		Inquiry Phone	
Company Making the Inquiry	Bartender Consumer USA INC DBA Drive Financial Services, 8585 North Stemmons Freeway, Suite 1100 North, Dallas, TX 75247	Inquiry Date	07-02-2014
Inquiry Name	GILBERT BACKERS	Inquiry Date of Birth	04-28-50
Inquiry Address	2216 W TIOGA ST PHILADELPHIA, PA 19140	Inquiry SSN	XXX-XX-XXXX
		Inquiry Purpose	Portfolio Review
		Inquiry Phone	

Case Number: [REDACTED]

Thursday, January 08, 2015

Company Making the Inquiry	Santander Consumer USA INC DBA Drive Financial Services, 8555 North Stemmons Freeway, Suite 1100 North, Dallas, TX 75247			Inquiry Date	08-12-2014
Inquiry Name	GILBERT BACKERS	Inquiry Date of Birth		Inquiry Purpose	Portfolio Review
Inquiry Address	2210 W TROSA ST PHILADELPHIA, PA 19144	Inquiry SSN	XXX-XX-XXXX	Inquiry Phone	

**Inquiry records that may impact your credit rating**

These inquiries are shared with companies that view your consumer file. These inquiries may also be used in credit scoring and may impact your credit rating. The purpose of each inquiry is noted below under Inquiry Purpose and may include applying for credit or financing, debt collection activities, or tenant screening. RiskView™ will report these inquiries on your file for up to 12 months. In addition, characteristics of the inquiry address, inquiry SSN, and inquiry phone, as of the date of this Disclosure Report, are included in this section.

Company Making the Inquiry	[REDACTED] 7305 HUDSON ROAD STE 100, Woodbury, MN 55125			Inquiry Date	11/29/2014
	on behalf of AMERICAN HERITAGE FEDERAL C.U. 2000 RED LION ROAD PHILADELPHIA, PA 19115				
Inquiry Name	GILBERT BACKERS	Inquiry Date of Birth	04/26/50	Inquiry Purpose	Application
Inquiry Address	80 E COLLOM ST PHILADELPHIA, PA 19144	Inquiry SSN	XXX-XX-XXXX	Inquiry Phone	
[REDACTED]					
Address Valid			Address Do Not Deliver Status		
Address Dwelling Type			Number of Units at address		
Correctional Address			Address County Median AVM Value		
Corporate / Military Address			Address Tract Median AVM Value		
Address Type			Address Block Median AVM Value		
Address Mail Usage *			Address AVM Value 1 Year Ago		
Address Delivery Status			Address AVM Value 5 Year Ago		
Address Mail Drop Indicator			Number of Identities Currently Reported at Address		
High Risk Address Description *			Number of SSNs Currently Reported at Address		
High Risk Address Source			Number of Phones Currently Reported at Address		
[REDACTED]					
Inquiry SSN Low/High Issue Date	01/01/1965 / 12/31/1967	Number of Identities Associated with Inquiry SSN			
Inquiry SSN State of Issuance	PA	SSN Issuance Source	Social Security Administration		
Inquiry SSN Reported Deceased	No	Death Record Source			
[REDACTED]					
Inquiry Phone Indicator			Inquiry Phone Disconnected in the Last 12 Months		
Inquiry Phone Zip Code Match			Inquiry Phone Type		
Number of Identities Currently Reported at Phone			Inquiry Phone Characteristics Source		

Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00

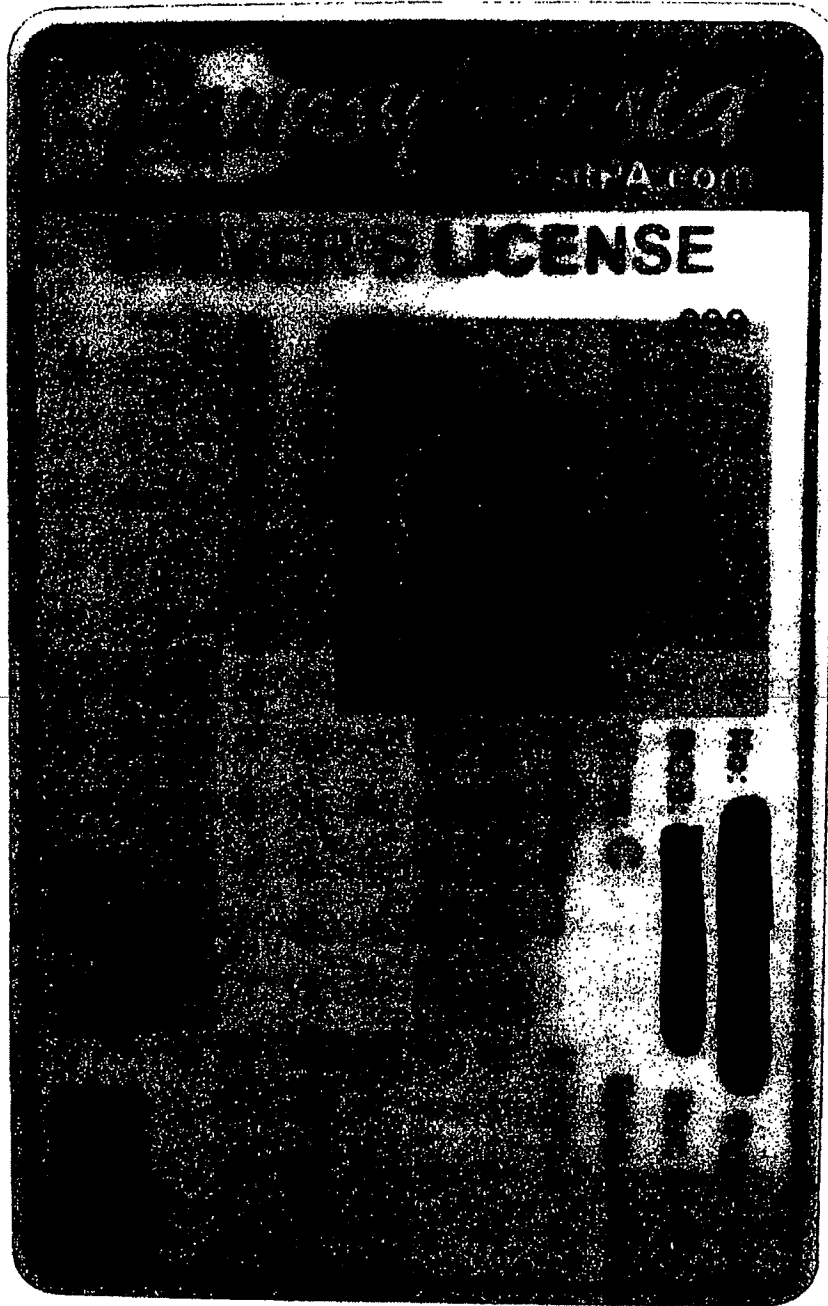
Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00

Case Number: [REDACTED]		Thursday, January 08, 2015
Inquiry Phone High Risk Description *	High Risk Phone Source *	
Current Phone Listings at Inquiry Address	Inquiry Phone Current Listings	
Inquiry Phone Listing Source		

Company Making the Inquiry		M 8 CHESTNUT ST FL 2ND, BOYERTOWN, PA 19012		Inquiry Date		08/11/2014	
Inquiry Name		GILBERT BACKERS		Inquiry Date of Birth		Inquiry Purpose	
Inquiry Address		80 E COLLOM ST PHILADELPHIA, PA 19144		Inquiry SSN		Collections	
Inquiry Phone		XXX-XXX-XXXX		Inquiry Phone			
Address Valid				Address Do Not Deliver Status			
Address Dwelling Type				Number of Units at address			
Correctional Address				Address County Median AVM Value			
Corporate / Military Address				Address Tract Median AVM Value			
Address Type				Address Block Median AVM Value			
Address Mail Usage *				Address AVM Value 1 Year Ago			
Address Delivery Status				Address AVM Value 5 Year Ago			
Address Mail Drop Indicator				Number of Identities Currently Reported at Address			
High Risk Address Description *				Number of SSNs Currently Reported at Address			
High Risk Address Source				Number of Phones Currently Reported at Address			
Inquiry SSN Low/High Issue Date		01/01/1965 / 12/01/1967		Number of Identities Associated with Inquiry SSN			
Inquiry SSN State of Issuance		PA		SSN Issuance Source		Social Security Administration	
Inquiry SSN Reported Deceased		No		Death Record Source			
Inquiry Phone Indicator		Valid Residential Phone		Inquiry Phone Disconnects in the Last 12 Months			
Inquiry Phone Zip Code Match		Yes		Inquiry Phone Type		Regular (Plain Old Telephone Service - POTS)	
Number of Identities Currently Reported at Phone				Inquiry Phone Characteristic Source			
Inquiry Phone High Risk Description *				High Risk Phone Source *			
Current Phone Listings at Inquiry Address		(215) 842-0145 AL WASHINGTON		Inquiry Phone Current Listings		V WYLLIE, 80 E COLLOM ST , PHILADELPHIA, PA 19144	
Inquiry Phone Listing Source							

Company Making the Inquiry		7805 HUDSON ROAD STE 100, Woodbury, MN 55125		Inquiry Date		08/13/2014	
on behalf of		[REDACTED]					
ACADEMY RD & RED LION RD		PHILADELPHIA		PA			
19114							

Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00



DL-600 (2-68)  
D William H. Hensley  
0000000000

Gilbert J. Backers  
80 East Collom Street  
Apartment 206  
Philadelphia, Pa 19144  
215 [REDACTED]

Chex Systems, Inc.  
7805 Hudson Road, Suite 100  
Woodbury, MN 55125

RE: Gilbert J. Backers SSN: [REDACTED] DOB: [REDACTED]

**Request for Telephone Numbers**

Dear Chex Systems,

Recently I received a copy of my Riskview consumer report from Lexis Nexis. According to my Riskview report, the following companies accessed my Chex Systems consumer report in the last 12 months. See excerpt from my Riskview consumer report enclosed.

American Heritage Federal Credit Union Date of Inquiry 11/2/2014

Beneficial Bank Dates of Inquiry 6/13/2014,

**I would like to request the telephone number for American Heritage Federal Credit Union and For Beneficial Bank.**

Enclosed please find a copy of my identification.

**Please redact the first five digits of my Social Security number on my consumer report. Please do not print the first five digits of my Social Security number on my consumer report.**

Thank you.

Sincerely,

Gilbert J. Backers 2/23/15  
Gilbert J. Backers Date

Case# 2015-24612-3 Docketed at Montgomery County Prothonotary on 09/17/2015 9:06 AM, Fee = \$0.00

Gilbert J. Backers  
80 East Collom Street  
Apartment 206  
Philadelphia, Pa 19144  
215- [REDACTED]

Chex Systems, Inc.  
7805 Hudson Road, Suite 100  
Woodbury, MN 55125

RE: Gilbert J. Backers SSN: [REDACTED] DOB: [REDACTED]

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Gilbert J. Backers Sr.  
Gilbert J. Backers Date  
10/21/15

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Gilbert J. Backers      Date

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SSN: [REDACTED]

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*Gilbert J. Backers*      11/2/15  
Gilbert J. Backers      Date

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